

Sugg, William P

From: Sugg, William P
Sent: Thursday, September 03, 2015 4:44 PM
To: Wayne Turner
Cc: Gallagher, Tony
Subject: SWS Permit Application Review - Winston-Salem Overdale YW facility (Permit 3409)

Dear Wayne,

We have reviewed the permit application for the Overdale Road Yard Waste facility Winston-Salem submitted in July 2015. Per your application, composting will no longer be conducted at the site and the facility will operated solely as a solid waste treatment and processing facility per Rule .0300 of the Solid Waste Management Rules. In addition to our preliminary review, we conducted a permit review site visit on August 25, 2015 to gather information for our review.

Based on the information gathered thus far the following items need to be addressed in order for us to complete our review:

Section 1 – Background

1. It is our understanding that Wallace Farms is now the contracted Facility Operator. Please update to reflect new operator. If Wrico is still involved as subcontractor to Wallace and will be the onsite contact, then include that info as well for understanding of operations management structure.
2. Confirm whether City staff onsite or contractor will be onsite contact for DWM.

Section 4 – Process Descriptions

1. Include a statement that public distribution of processed material will no longer be conducted at the facility.
2. Note types of unacceptable waste that will be rejected (ie, engineered wood, metal, painted/treated wood, etc) and expand on ‘disposed of in an appropriate location and manner’. Will rejects be sent to MSW or CDLF?
3. Note expected time processed material will be stored onsite prior to transferring to Wallace Farms.
4. Explain what ‘further processing’ entails. Will all material be composted or used for mulch or boiler fuel or other? Note that unprocessed yard trash (leaves, grass clippings) may not be distributed to public unless first composted per Rule .1400. DWM requests information on how material will be used once transferred offsite.

Section 5 – Operation Plan

NOTE: Much of the information contained in the most recent Operations Plan for the facility could be included with this application Operation Plan section and can used to address some of the items listed below. For consistency at this facility, you may want to consider simply revising the current Ops Plan for the T&P operation.

1. In the description of operations, include anticipated process time for materials delivered; length of time materials will remain onsite before & after processing; management of site to prevent standing water around storage piles.
2. Provide an estimate of amounts of each material type received & processed per week in categories of 1) yard waste; 2) woody waste; and 3) leaves/grass clippings, and other if applies. Recent annual reports sent to SWM are a good source for this information.
3. Include maximum stockpile size limits of 30ft high by 50ft wide for pre- and post-processed materials.
4. Note clearly whether processed materials will be stockpiled separately based on source or mixed and if processed materials will be comingled when transporting offsite. Please explain.

5. Recordkeeping – state how facility will document and maintain records of materials received and processed, expressed in tonnages. Include statement about submitting annual report to DWM.
6. Contingency Plans - include description of contingency for things such as equipment failures, emergencies/fires, changes in amounts of materials received, other.

Other

1. Process Diagram – Include breakdown of primary categories of materials and their expected subtotals (tons/yr). Also, show grinding and storage of material categories are kept separate, if applies.
2. Facility Aerial map – show property boundaries clearly
3. Fire Safety – include a letter from the local fire marshal/chief that verifies fire dept capable to handle fire emergencies that may occur at the facility.
4. Confirm the Parcel ID(s) for the property. According to the Forsyth Co Online GIS, the 8-ac facility is on a larger 58-ac parcel (PIN 6833-75-9831) with most of the parcel acreage comprised of the undeveloped land across the road to the north and west.
5. Please provide a copy of the current Stormwater Permit NCG240009 that applies to this facility (according to NC SW Program online service, this permit expires Sept 30, 2016).
6. Confirm that the onsite Facility Operator is Wallace Farms Inc. Also clarify whether W-S will be directing the contracted operator in decision-making or whether contractor will be the primary decision maker for operations.

Once you've had the opportunity to review these comments, I will be happy to discuss and assist. I realize this may seem like a lot of comment, but I think you'll find most are minor and can be culled from the old Ops Plan. If you need a copy of the recent Ops Plan, I will send that as well.

Please feel free to call anytime.

Thank you.

Perry Sugg, PG Permitting Hydrogeologist

NC Department of Environment & Natural Resources

Division of Waste Management – Solid Waste Section

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Sugg, William P

From: Wayne Turner <waynet@cityofws.org>
Sent: Thursday, September 17, 2015 2:21 PM
To: Sugg, William P
Cc: Gallagher, Tony
Subject: T & P Permit App
Attachments: Overdale T & P Permit Application Complete - Revised 9-14-2015 Part 1.pdf

Perry/Tony,

Thanks for your feedback and comments on the initial Overdale Yard Waste T & P Permit application. I've answered all of the questions below in italics and revised the permit application where clarity was important. I've attached a revised permit application in two parts along with an EAP. (Part 2 and EAP to follow.) Thank you for suggesting to use the language in the previous operations plan; that was a time-saver. I also made references to the sections of the permit app that are related to some of the questions and answers.

Please let me know if you have any questions.

Wayne

From: Sugg, William P [<mailto:perry.sugg@ncdenr.gov>]
Sent: Thursday, September 03, 2015 4:44 PM
To: Wayne Turner
Cc: Gallagher, Tony
Subject: SWS Permit Application Review - Winston-Salem Overdale YW facility (Permit 3409)

Dear Wayne,

We have reviewed the permit application for the Overdale Road Yard Waste facility Winston-Salem submitted in July 2015. Per your application, composting will no longer be conducted at the site and the facility will operated solely as a solid waste treatment and processing facility per Rule .0300 of the Solid Waste Management Rules. In addition to our preliminary review, we conducted a permit review site visit on August 25, 2015 to gather information for our review.

Based on the information gathered thus far the following items need to be addressed in order for us to complete our review:

Section 1 – Background

1. It is our understanding that Wallace Farms is now the contracted Facility Operator. Please update to reflect new operator. If Wrico is still involved as subcontractor to Wallace and will be the onsite contact, then include that info as well for understanding of operations management structure.

Please see Section 1 of the revised permit app.

2. Confirm whether City staff onsite or contractor will be onsite contact for DWM.

Please see Section 2 of the revised permit app.

Section 4 – Process Descriptions

1. Include a statement that public distribution of processed material will no longer be conducted at the facility.

It is our intent that composting will not take place at this facility, however, we would like to retain the right to sell or distribute both mulch and compost products. Compost products sold at this facility will NOT be produced at it. Mulch or boiler fuel products may be produced, sold and distributed at the facility.

Please see Section 7E of the revised permit app for further information on this subject.

2. Note types of unacceptable waste that will be rejected (ie, engineered wood, metal, painted/treated wood, etc) and expand on 'disposed of in an appropriate location and manner'. Will rejects be sent to MSW or CDLF?

The contractor is responsible for disposal of unacceptable materials and is required in the contract to dispose of it at an approved disposal facility. Further, the contractor may dispose of unacceptable materials at City landfills without charge so it is my expectation that he will use that option. However, since the Overdale Rd. Transfer Station, operated by Republic Services is less than a mile away from the Overdale T & P Facility, it may also be an option for the contractor to dispose of unacceptable materials. Please see Sections 4 & 7 of the revised permit app for more information.

3. Note expected time processed material will be stored onsite prior to transferring to Wallace Farms.

Please see Sections 7D & 7E of the revised permit app.

4. Explain what 'further processing' entails. Will all material be composted or used for mulch or boiler fuel or other? Note that unprocessed yard trash (leaves, grass clippings) may not be distributed to public unless first composted per Rule .1400. DWM requests information on how material will be used once transferred offsite.

Further processing will include any processing allowed under the Wallace Farm Type 3 composting permits. We don't want to imply that WF will transfer everything from Overdale to their new Davie County facility. Though unlikely, it is possible they may transfer some to their Huntersville facility. Please see Section 7E of the revised permit app for additional information.

Section 5 - Operation Plan

NOTE: Much of the information contained in the most recent Operations Plan for the facility could be included with this application Operation Plan section and can be used to address some of the items listed below. For consistency at this facility, you may want to consider simply revising the current Ops Plan for the T&P operation.

1. In the description of operations, include anticipated process time for materials delivered; length of time materials will remain onsite before & after processing; management of site to prevent standing water around storage piles.

Please see Sections 7D & 7E of the revised permit app.

2. Provide an estimate of amounts of each material type received & processed per week in categories of 1) yard waste; 2) woody waste; and 3) leaves/grass clippings, and other if applies. Recent annual reports sent to SWM are a good source for this information.

We maintain extensive records of incoming waste at the Overdale facility on a monthly basis and propose to use that as the basis for showing incoming weights.

Please see Section 5 of the revised permit app for more information.

3. Include maximum stockpile size limits of 30ft high by 50ft wide for pre- and post-processed materials.

Included in Sections 7C & 7D of the revised permit app.

4. Note clearly whether processed materials will be stockpiled separately based on source or mixed and if processed materials will be comingled when transporting offsite. Please explain.

Please see Sections 7C & 7D of the revised permit app.

5. Recordkeeping – state how facility will document and maintain records of materials received and processed, expressed in tonnages. Include statement about submitting annual report to DWM.

Please see Section 11 of the revised permit app.

6. Contingency Plans - include description of contingency for things such as equipment failures, emergencies/fires, changes in amounts of materials received, other.

Please see Section 10 of the revised permit app.

Other

1. Process Diagram – Include breakdown of primary categories of materials and their expected subtotals (tons/yr). Also, show grinding and storage of material categories are kept separate, if applies.

Without going to the expense of having an engineering drawing done for the process flow, I have extensively modified the original block diagram to better show the amounts, types and flow of the materials. I hope this adequately conveys the information that you requested. See the revised Processing Flow Diagram.

2. Facility Aerial map – show property boundaries clearly

Please see the Overdale T & P Facility Aerial Map in the revised permit app.

3. Fire Safety – include a letter from the local fire marshal/chief that verifies fire dept capable to handle fire emergencies that may occur at the facility.

4. Confirm the Parcel ID(s) for the property. According to the Forsyth Co Online GIS, the 8-ac facility is on a larger 58-ac parcel (PIN 6833-75-9831) with most of the parcel acreage comprised of the undeveloped land across the road to the north and west.

Parcel ID for the property is confirmed as well as the two (2) lots within the parcel that make up the facility.

Please see Location Map 1 in the revised permit app for more information on this subject.

5. Please provide a copy of the current Stormwater Permit NCG240009 that applies to this facility (according to NC SW Program online service, this permit expires Sept 30, 2016).

Since we are applying for a Treatment and Processing Permit, the NPDES General Permit NCG240000 for composting facilities will no longer apply to this facility. Upon receipt of the T & P permit, we will notify DWQ of the change in the operation of this facility.

6. Confirm that the onsite Facility Operator is Wallace Farms Inc. Also clarify whether W-S will be directing the contracted operator in decision-making or whether contractor will be the primary decision maker for operations.

Wallace Farm is the on-site managing operator of the facility. They are responsible for the day-to-day decisions affecting the operation of the facility. The City remains the permittee of record and the governing body of the facility, with policy-making authority to direct Wallace Farm in the overall operation of the facility.

Please see Section 1 of the revised permit app for further information on this subject.

Once you've had the opportunity to review these comments, I will be happy to discuss and assist. I realize this may seem like a lot of comment, but I think you'll find most are minor and can be culled from the old Ops Plan. If you need a copy of the recent Ops Plan, I will send that as well.

Please feel free to call anytime.

Thank you.

Perry Sugg, PG
Permitting Hydrogeologist

NC Department of Environment & Natural Resources
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