



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

Pat McCrory
Governor

John E. Skvarla, III
Secretary

August 18, 2014

Sent Via Email - bperry@omnisource.com

Mr. Bill Perry, Regional Manager
OmniSource Southeast LLC - Kernersville Plant
P.O. Box 608
Kernersville, NC 27285-0608

Subject: Completeness and Technical Review Letter
Permit to Operate, Renewal Application
OmniSource Southeast LLC - Kernersville Plant, Industrial Landfill
Permit Number- 3420-INDUS-2005
Forsyth County, DIN 21553

Dear Mr. Perry:

The Division of Waste Management, Solid Waste Section (Section) has conducted a completeness and technical review of the document entitled:

OmniSource-Kernersville, Landfill Reclamation Project, Permit Number 34-20. 2014, Renewal Application. Prepared by: Joyce Engineering. May 27, 2014. DIN 21157.

The submittal has been reviewed for completeness in accordance with General Statute 130A-295.8(e). A determination of completeness means that the application includes all required components but does not mean the required components provide all of the information that is required for the Section to make a decision on the application. At this time you need to satisfy the requirements of the compliance review and financial assurance requirements before your application can be deemed complete. A permit cannot be issued until this occurs.

The renewal of an existing Solid Waste Permit must also meet all the requirements of North Carolina Administrative Code 15A NCAC 13B and G.S. Article 9, Solid Waste Management § 130A. Listed are questions and comments from the Solid Waste Section concerning the technical aspects of your application.

1. OmniSource Southeast LLC is listed as the Permit Owner and Operator of the Solid Waste Management Facility, Permit No. 3420-INDUS-2005. The Forsyth County tax records show that the property owner is Atlantic Scrap & Processing, Llc. Is this correct?
2. As part of the final cap design the permeability of the soil layer below the landfill's subgrade elevation has to be determined. Has this been previously completed?
3. When the existing auto fluff cell is excavated down to the bottom of the landfill, has the subgrade elevations been recorded? If not, in the future the subgrade elevations need to be surveyed by a Registered Professional Surveyor (minimum on a 50 foot grid) and included in the Facility Plans. Also, the bottom elevation of waste can be documented

that it is a minimum of four feet above the seasonal high water table; 15A NCAC 13B .0503(i), if it has not been previously.

4. Please provide any previously approved plans or construction drawings that you have since the site was opened that relate to the landfill.
5. The outside edge of waste needs to be located and marked and its location surveyed by a Professional Surveyor and recorded in the Facility Plan. The determination of the landfill area is needed to calculate the acreage of the final cap for your closure costs. It will also be needed for the design of the final cover system.
6. An updated topographical map of the landfill facility is required. The topo in the plans is from 2001.
7. Any Stormwater Permits or Plans need to be included in the application and be on site.
8. Provide plans and details for the perimeter ditch and sedimentation basins and check dams.
9. Does the Global Static and Seismic Slope Stability Study take into account the soil and waste engineering properties and design of the existing outer soil berm with the waste? The detail of this berm is needed.
10. Provide a certified copy of the property survey for the landfill facility.
11. Please provide background information on the "Notice of Residual Petroleum" (UST incident) dated September 22, 2009 issued by NCDENR - Waste Management. Should United Recyclers be listed on the permit as an Operator at the site and Atlantic Scrap & Processing, Llc. as the Owner, as per the Notice (BK: RE 2915, PG: 4369-4370)?
12. Determine if the application meets the requirements of 15A NCAC 13B .0503 and .0504. The requirements that are met and included in previous documents are to be included in this application and clearly marked as to their original date and location.

Review of Operation Plan

13. Section 1.8:
Copy of the Permit to Operate needs to be added to the list of records to be kept on site for the Operating Record.
14. Section 2.2.1:
This Section mentions that material w/ excessive moisture will be placed in windrows or stockpiled for drying in a natural gas rotary dryer. Where will the windrows, stockpiles, and rotary dryer be located?
15. Section 2.2.2
Where will the in-feed storage area be on site? Please locate it on the facility drawing.
16. Section 2.2.3 & 2.2.4
The residual stockpile material that will be returned to the landfill needs to be shown on the facility plan. Section 2.2.7 states that the entire residue stockpile is located within the footprint of the existing landfill. It should also be described as such in these sections.
17. Section 2.2.5
This section discusses fines processing. The plan describes that this material originates from the processing plant. At this point the material still has waste material in it that will be returned to the landfill. I do not believe we can consider any of the fines as recovered material. Therefore, we feel the owner needs to clarify where this material is stored and what types of equipment or measures will be used to ensure none of this material is lost prior to processing.

18. Section 2.7

The plan discusses diverting water runoff away from the working face by use of temporary diversion berms. Where will the storm water from the berms be directed? Stormwater runoff from the landfill will most likely contain waste. What will be used to prevent waste from leaving the footprint of the landfill? 13B .0505 (4) & (5)

19. Section 2.2.8 & 2.2.9

The applicant needs to clarify what is meant by the term “intermediate cover” written under the 4th bullet. Also, the timeline (15 months) for establishing vegetative cover may not be sufficient.

Review of Site Plan Drawings

20. Drawing No. CP-T

Craven County should not be cross-hatched.

21. Drawing No. CP-01

Ground and surface water monitoring locations need to be added to the plan.

Edge of waste markers needed to be installed and surveyed.

22. Drawing No. CP-01

A minimum of two cross-sections of the Final Grading Plan are necessary showing existing and final grades, approximate seasonal high groundwater table, probable bedrock soil interface, excavated contours, structural fill and proposed and existing cells,

If you should have any questions, do not hesitate to contact C. T. Gerstell at 704-235- 2144 or myself at the Mooresville Regional Office.

Sincerely,



John Murray, P.E.
Environmental Engineer
Solid Waste Section

cc: James Winegar, Omnisource Southeast, LLC, 2233 Wal-Pat Rd., Smithfield, NC 27577
C. T. Gerstell, SWS
Sarah Rice, SWS
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