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4504T-TRANSFER-1998	July 29, 2014	21476



RECEIVED
July 22, 2014
Solid Waste Section
Asheville Regional Office

HENDERSON COUNTY ENGINEERING

1 Historic Courthouse Square, Suite 6
Hendersonville, North Carolina 28792
(828) 694-6526

July 21, 2014

Ed Mussler, P.E., Supervisor
Permitting Branch, Solid Waste Section
Division of Waste Management, NCDENR
1646 Mail Service Center
Raleigh, NC 27699-1646

Larry Frost, Environmental Engineer
Permitting Branch, Solid Waste Section
Division of Waste Management, NCDENR
2090 US Highway 70
Swannanoa, NC 28778

Mr. Mussler & Mr. Frost,

This cover letter is to inform you of the addition of universal waste handling, specifically mercury products recycling, to the operations permit for Henderson County Convenience Center, # 4504T-TRANSFER-1998.

A new storage facility will be located on the property at 265 Convenience Center Drive, Hendersonville, NC 28792 as provided through a grant from NC DENR, DEACS Division. The storage shed facility will hold a variety of mercury-containing products and lamps containing mercury from Henderson County residents under the following terms:

- This program would operate Monday through Friday from 8:00am until 4:30pm at the Henderson County Convenience Center year-round for residents of Henderson County.
- Participation in this program would be 100% free for residents of Henderson County.
- Solid Waste staff and the Environmental Programs Coordinator will be properly trained by the vendor chosen under Term Contract 926B.
- Staff will be available to educate residents on-site or through scheduled appointments when necessary.

The Henderson County Mercury Products Recycling Program will accept the following materials:

1. Lamps containing mercury (LCMs), such as fluorescent light bulbs, including ballasts, CFLS, tubes (4ft. and 8ft.), and other related materials
2. Mercury containing devices (MCDs), such as barometers, thermostats, and other non-lamp mercury-containing products

All products covered within the category LCMs (#1 above) will be recycled through Cleanlites Recycling, Inc. out of the Spartanburg, SC location. All products covered within the category MCDs (#2 above) will be recycled through Thermostat Recycling Corporation out of the Alexandria, VA location. All mercury-containing products collected at the Henderson County Convenience Center will be shipped in accordance with Universal Waste Regulations, 15A NCAC 13A.0119, and proper records will be maintained for the appropriate length of time as mandated within 40 CFR Part 273 and as deemed by NC DENR, Division of Waste Management, to be appropriate for Henderson County.

Records of collected universal waste and shipments will be maintained by the Environmental Programs Coordinator and Solid Waste Director.

Please do not hesitate to contact me should you have questions or comments. Henderson County looks forward to continuing our work together to reduce waste and increase recycling across North Carolina. Thank you.

Sincerely,

Rachel Hodge, Environmental Programs Coordinator
rhodge@hendersoncountync.org
(828) 694-6524



HENDERSON COUNTY ENGINEERING

*1 Historic Courthouse Square, Suite 6
Hendersonville, North Carolina 28792
(828) 694-6526*

ATTACHMENTS:

NOTIFICATION OF HENDERSON COUNTY SOLID WASTE UNIVERSAL WASTE HANDLING PERMIT ADDITIONS, 5 total pages

NOTIFICATION OF HENDERSON COUNTY SOLID WASTE UNIVERSAL WASTE HANDLING PERMIT ADDITIONS

Section 1: General Conditions

Part A: Universal Waste Acceptance

Henderson County Solid Waste Division will accept mercury-containing devices (MCDs) and lamps containing mercury (LCMs) from residents of Henderson County. MCDs and LCDs will be accepted at the Convenience Center, located at 265 Convenience Center Drive, Hendersonville, NC 28792, Monday through Friday from 8:00 AM until 4:30 PM. Staff will oversee and assist in the receiving of these products to ensure that wastes are intact and are not broken/ leaking. Staff will also see to it that products brought in for mercury recycling are properly stored in containers and a list of items received for the purposes of inventory tracking and invoicing are properly kept.

Part B: Universal Waste Storage

A designated storage facility will be located and maintained at the Convenience Center. The overall area is secured by a fenced enclosure with a locked gate at the intersection of Convenience Center Drive and Stoney Mountain Road. The collection area for mercury-containing products will be signified by at least one (1) sign on the storage shed, plus a larger sign on a metal post concreted into a bucket so that it is movable. Inside the shed, appropriate containers will be located and labeled so as to collect different types of mercury-containing products. Proper storage techniques will be applied so that appropriate record-keeping is done. A specific label will be placed on the outside of the container when the first waste has been placed in the container and will detail the following information: date that first waste was placed in the container, notification that the container holds a universal waste and can be specified as to which type.

Part C: Training and Emergency Response

Solid Waste and Environmental Programs staff will be trained in the proper handling and storage procedures associated with the management of MCDs and LCMs. Spill containment and decontamination procedures, as well as proper spill response procedures, will be detailed for training. A mercury spill kit and a sign detailing clean-up procedures will be provided and posted inside of the storage area and all staff will be appropriately trained on these procedures. Emergency response training will be conducted at least once (1) per year.

Part D: Universal Waste Recycling

MCDs and LCMs will be shipped to a company authorized to manage and recycle these materials. Further descriptions of these companies can be found in Sections 2 and 3.

Section 2: Management of Mercury-containing Devices (MCDs)

Part A: Acceptance

Waste MCDs are defined as thermostats which contain an ampule of mercury as a functioning part of this device. These devices must be received with the ampule intact so that mercury is not released into the environment. MCDs will be accepted at no charge at the Convenience Center, located at 265 Convenience Center Drive, Hendersonville, NC 28792, Monday through Friday from 8:00 AM until 4:30 PM.

Part B: Packaging and Storage

MCDs will only be stored in the designated universal waste handling area at the Convenience Center. These devices will be placed into a sealed bag and then a plastic bin provided by the vendor if they seem to have leaked or have spillage. A label will be placed on the container once the first MCD is collected. The bins will remain closed at all times until shipping is ready to occur. Storage of the bins will be limited to one (1) year or until the bins are full, whichever occurs first.

Part C: Recycling Vendor

Thermostat Recycling Corporation (TRC), Henderson County Solid Waste, and Henderson County Environmental Programs will partner to recycle waste containing mercury. Bins are shipped from TRC to the Convenience Center and once these bins are full, Solid Waste staff or the Environmental Programs Coordinator will contact TRC to make arrangements for pick-up. At the time of pick-up, either additional bins will be provided by the vendor for MCDs or bins will have already been purchased by Henderson County Solid Waste Division for this specific use.

Part D: Emergency Response and Clean-up

In the event an MCD is broken at the Henderson County Convenience Center facility, the following procedures will be enacted: staff will don latex/nitrile gloves, a form of PPE to cover the nose and mouth, and protective eye wear once the breakage/leakage of the MCD has been discovered. Staff should allow the facility time to air out so as to reduce potential harm from vapors. Any remnants will be collected and a dustpan by use of a squeegee and placed in the bag. Staff will use the mercury spill kit to properly handle the spilled universal waste. The date of occurrence will be written on the label of the container. The container with the broken or spilled mercury containing products will be transferred to Thermostat Recycling Corporation within ninety (90) days of the event occurring. Proper documentation of the event, including date and type of spilled/broken/leaking MCD will occur and digitally stored by the Environmental Programs Coordinator.

Section 3: Management of Lamps Containing Mercury (LCMs)

Part A: Acceptance

Unbroken waste LCMs will be accepted at the Henderson County Convenience Center, located at 265 Convenience Center Drive, Hendersonville, NC 28792, Monday through Friday from 8:00 AM until 4:30 PM. Residential quantities of lamps will be accepted at no charge at the facility. Broken bulbs will be accepted and placed into a separate 55-gallon steel drum, DOT approved with a locking ring and lid. Commercial quantity generators of LCMS will be directed to use Cleanlites Recycling Inc. or Southeast Recycling Technologies to handle their volume of waste LCMs. This information will be provided to them by the Environmental Programs Coordinator and/or by Solid Waste Staff upon request and during outreach and education programs.

Part B: Packaging and Storage

LCMs will only be stored in the designated universal waste handling facility at the Henderson County Convenience Center. Waste lamps will be placed into appropriate containers provided by the vendor, which are structurally sound, adequate to prevent breakage, and are compatible with the contents of the lamps. Upon the first lamp being placed in a container, a label will be applied signifying that the container holds universal waste and the corresponding date. Filled containers will be stored within the facility at the Convenience Center, which can be locked by staff from the outside. Two 72-in H x 48-in W x 24-in D 5-tier steel freestanding shelving units will be located inside of the storage facility on which containers can be safely organized. Storage of the bins will be limited to one (1) year or until the bins are full, whichever occurs first.

Part C: Recycling Vendor

Cleanlites Recycling Inc. of Spartanburg, SC, Henderson County Solid Waste Division, and Henderson County Environmental Programs will partner to LCMs. Cleanlites Recycling Inc. is an approved vendor under the state Convenience Contract 926B for the recycling of LCMs.

Part D: Emergency Response and Clean-up

In the event that a lamp containing mercury is broken at the Henderson County Convenience Center facility, the following procedures will be enacted: an operator will don latex/nitrile gloves, a form of PPE to cover the nose and mouth, and protective eye wear once the breakage/leakage of the LCM has been discovered. The operator should allow the facility time to air out so as to reduce potential harm from vapors. The operator will then put any broken pieces in a sealable bag. Remnants will be collected in a dustpan by use of a squeegee and placed in the bag. The operator will use the mercury spill kit to properly handle and clean up the mercury from the spilled universal waste. The date of occurrence will be written on the label of the container. The container with the broken or spilled mercury containing products will be transferred to Cleanlites Recycling Inc. within ninety (90) days of the event occurring. Proper documentation of the event, including date and type of spilled/broken/leaking MCD will occur and digitally stored by the Environmental Programs Coordinator.

Section 4: Henderson County Solid Waste and Environmental Programs Universal Waste Logs

BALLAST/CAPACITORS/FIXTURES						
DATE	PCB Ballast	DEHP Ballast	Capacitor	≤ 4 ft. 2 or 4 bulb fixtures	≥ 5 ft. 2 or 4 bulb fixtures	Other (please describe)

MERCURY CONTAINING DEVICES (MCDs)					
DATE	Thermostats (wall mounted)	Thermometers	Barometers	Elemental	Other (please describe)

UNIVERSAL WASTE LAMPS (LCMs)												
DATE	≤ 4 ft. fluorescent tubes	≥ 5 ft. fluorescent tubes	CFLs	U-shape or circular lamps	HID lamps	Incandescent blubs	Neon lamps	UV lamps	Shield lamps	Projector lamps	Flood, plastic encased spots	Other Hg lamps, bulbs

Section 5: Henderson County Solid Waste and Environmental Programs Mercury Containing Products Handling Signage

The following information will be posted on a sign outside of the designated storage facility at the Henderson County Convenience Center, as well as inside of the facility. Wording is subject to change according to needs for improvement as deemed necessary by Solid Waste or Environmental Programs staff.

This is a Designated Universal Waste Handling Area

ABSOLUTELY ZERO NON-MERCURY PRODUCTS SHOULD ENTER OR BE STORED INSIDE OF THIS FACILITY

Henderson County Solid Waste is a permitted small quantity universal waste handler.
Only trained Solid Waste or Environmental Programs staff should handle waste collected within this facility.

Fluorescent tube lamps should NOT be bound together with tape.
Bound lamps must be stored separately from non-bound lamps.

If your mercury containing products are leaking or broken, see a staff member immediately and do not attempt to clean up the leakage or spillage yourself.

All containers used to store mercury containing products must be properly closed when not being filled or handled by trained staff.

All containers **MUST BE PROPERLY LABELED** with the following information written legibly on the outside:
Contents- Universal Waste Lamps/Devices
Henderson County Solid Waste Division
Date of Accumulation

This storage facility must be closed when not in use and locked after normal business hours.

In the case of emergency, call Solid Waste at (828) 697-4505 or Environmental Programs at (828) 694-6524.

Thank you for recycling!

