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

Pat McCrory
Governor

John E. Skvarla, III
Secretary

August 7, 2014

Mr. David King
Shotwell Transfer Station II
3209-120 Gresham Lake Road
Raleigh, NC 27615

Subject: Permit Application Review
Apex C&D Waste Transfer Facility (Shotwell Transfer Station II)
9229T-TRANSFER-2009, Wake County, Document ID No. 21546

Dear Mr. King,

On June 4, 2014, the Division of Waste Management, Solid Waste Section (Section) received an application for a 10-yr permit amendment for the transfer station. (DIN 21192). A technical review of the application has been conducted. Please address the following comments and questions concerning the application.

1. Provide an applicant certification and certification by land owner forms. The forms, which can be filled in using Adobe, will be sent to you via e-mail. Let me know if you have any problems. This is the information you need to include on the landowner form.
 - Facility Name: Shotwell Transfer Station II
 - Facility Type: C&D Transfer Facility
 - Submitted by: Shotwell Transfer Station II, Inc.
 - Address: 1506½ North Salem Street
 - City: Apex
 - State: NC
 - County: Wake
 - Deed Book: 11285
 - Pages : 1429-1432
2. (Section 1.0) Please indicate the street address for the facility: 1506½ North Salem Street.
3. (Section 1.2.2) Please add a contact name for Booth Properties.
4. (Section 1.4.1 and Figure 1) The gate is not shown on Figure 1 and since you are discussing the entrance from the street is it not clear where it is located. Please indicate that the gate is at the entrance to the facility.

5. (Figure 1) I do not see a north arrow on the figure. Assuming that the top of the drawing is north, there is an area on the east above “Fuel Tanks” that I believe is used for storage of inert debris. If this is the case, you should include it in the facility boundary.
6. (Section 1.7.2) Last sentence states “... this information is considered as a basis of understanding and may not be replaced by the direction and skill of the local Fire Marshall.” I believe you meant to say “... and may be replaced by the direction and skill of the local Fire Marshall.” Remove “not”.
7. (Section 1.7.4) Consider adding the following to the list of general fire management strategies: “Excavating the burning material (displacing fuel) and then extinguishing it in a small controlled area.”
8. (Section 1.7.4) Consider changing last item to “Applying extinguishing agents that will interfere with and inhibit the combustion process at the molecular level. (Break the chemical reaction.)” This would be more consistent with your other examples which include a description of what is done to remove an element of the tetrahedron.
9. A financial assurance estimate should be included with the application. The financial assurance estimate included in the letter of July 21, 2014, can be used for this. However, the maximum amount of waste that could be on site at any time as shown in Section 2.5.1 as 15,000 tons and the amount shown in the estimate is 1,750 tons plus 300 tons extra recycling disposal shown in the financial assurance estimate. Please consider revising so that these estimates are correct and consistent. Also note that there is no credit for recyclables. They have to be treated as waste that will be disposed. The financial assurance requirement will be approved with the approval of the application and will be the amount required in your financial instrument.
10. (Section 1.12.6) Plan states that an MSDS “shall be collected on every waste (if available) that enters the facility”. MSDS are developed for products by the manufacturer to indicate hazards of a chemical. It is specific to the material and formulation. I would not a mixed load of C&D waste to have an MSDS. The sentence is also confusing because “shall” in regulations means “must”, yet the sentences also says “if available”. I believe your practice is to ask for an MSDS if you suspect that a load may contain a product being discarded that could be a health or safety hazard. The last two sentences are appropriate based on my understanding of OSHA requirements. If you do not ask each hauler for an MSDS when you enter the facility, I would consider removing or revising the first sentence. [Also note that MSDS are being phased out and replaced with Safety Data Sheet (SDS)].
11. (Section 2.4.1) The Section recommends that 1% of incoming waste be selected for random screening. The inspection report of November 25, 2013, indicated that waste screening at the facility was two loads a week and was also stated during my visit to the facility today. This meets the Section recommendation and exceeds the three times per quarter stated in the application. Please revise to reflect your actual screening practice.
12. (Section 2.5.2) The landfill with permit number 92-31 is no longer owned by WCA. The facility name should be Material Recovery C&D Landfill.

13. (Section 2.5.5) This section does not cover all the requirements that were in the plan previously approved (See DIN 16946). That plan reflected practices approved by NCDOT, NCDAQ, the Health Hazards Control Unit, NC DWM, and the Carolina Asphalt Pavement Association for recycling shingles. They have not notified us changes to the requirements which would allow use of shingles collected in the manner you describe. I will investigate further and then decide if your plan is acceptable.
14. (Section 2.6) Material recovery operations are only supposed to take place within the permitted waste limits (facility boundary) shown on Figure 1. See comment 5.

Please provide a response for each comment and/or revise the application as appropriate.

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: Vance Moore, P.E., Garrett & Moore
Ed Mussler, P.E., Permitting Branch Supervisor
Dennis Shackelford, Eastern District Supervisor
Shawn McKee, Environmental Senior Specialist