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North Carolina Department of Environment and Natural Resources

Pat McCrory  
Governor

Donald van der Vaart  
Secretary

March 23, 2015

Mr. Jeremy Alper  
Coastal Fiber & Recycling LLC  
PO Box 2139  
Wilmington, NC 28402

Re: Determination of Application Completeness and Application Review  
Coastal Fiber & Recycling LLC  
Location ID P1292, New Hanover County, Document ID No. (DIN) 24029

Dear Mr. Alper:

The Division of Waste Management, Solid Waste Section, received your permit application for the proposed Coastal Fiber & Recycling LLC transfer station (DIN 24013) on March 12 via email. This letter is to notify you that the application is considered complete within the context of North Carolina General Statutes (NCGS) §130A-295.8(e).

A determination of completeness means that the application includes all required components but does not mean that the required components provide all of the information that is required for the Section to make a decision on the application.

A review of the application was conducted and the follow comments are offered.

### Section 2 - Property Information

1. Please include a copy of the property deed as part of the legal description. A reference to this becomes part of the permit.
2. Attachment D is not a USGS topographic quadrangle map. You can download free topographic maps from the map store at <http://nationalmap.gov/ustopo/index.html>.

### Section 3 - Operation Plan

3. Abbreviations such as OCC, SOP, and C&D should be spelled out at their first appearance so that their meaning is clear.
4. In the first paragraph that begins with "1&2", the plan states "we do not anticipate nor are we offering to accept any solid waste materials". Materials that have served their original intended use and are discarded are solid waste. [See NCGS 130A-290(a)(35)]. The statement seems to be incorrect. If you are not accepting solid waste, you do not need a permit.

5. In the second paragraph under “1&2”, the plan states that “we will only process OCC and SOP” and that “C&D debris will be transferred”, yet you later describe separating recyclable materials from C&D waste and sorting C&D. By definition this is processing. [See NCGC 130A-290(a)(23)] Therefore, the statement appears to be incorrect.
6. In the paragraph that begins with “5&6” it is stated that “we will not be processing any construction debris at this facility”. This does not seem to be consistent with the rest of the plan which states you will accept C&D material and will be sorting recyclables (processing) from the waste. For reference, NCGS 130A-290(a)(4) states that "construction" or "demolition" when used in connection with "waste" or "debris" means solid waste resulting solely from construction, remodeling, repair, or demolition operations on pavement, buildings, or other structures, but does not include inert debris, land-clearing debris or yard debris.
7. In the paragraph that begins with “5&6” it is stated that “trucks will be met by a scale attendant and sent either to the C&D section or OCC-SOP section of the building to unload” but later states in the paragraph that begins with “14.” that a site manager will inspect incoming loads”. Can you clarify when the inspections will occur? A description of the screening process is needed. In addition to the unacceptable materials, you may need to address contaminated OCC. This will depend on the source of the OCC which isn’t specified in the application.
8. In the paragraph that begins with “5&6” it is stated that “materials ... will be moved, sorted and processed by CAT wheeled loaders and forklifts”. The plan does not mention any manual labor removing/picking out recyclables. Is this correct? The plan doesn’t describe the sorting operation or else isn’t clear.
9. In the paragraph that begins with “7.”, please clarify what you mean by “short term” on storage and in the “bunkers” versus in containers/trailers.
10. The paragraph that begins with “9.” does not address cleaning the tipping floor, open areas, and “bunker” storage areas. Please note that any liquid remaining from cleaning the tipping floor or liquid that has drained from wet waste entering the facility is defined as leachate and must be properly disposed. Please address the collection and disposal of this liquid. If it is directed to the stormwater system, please confirm with the Division of Energy, Mineral and Land Resources that it is approved under your permit. For reference, "leachate" means any liquid, including any suspended components in liquid that has percolated through or drained from solid waste. [See NCGS 130A-290(a)(16a) and 15A North Carolina Administrative Code 13B .0101(24).]
11. Please clarify what you mean by “bunker”? Is this an area with permanent walls, temporary areas defined by movable barriers, etc.?
12. In the paragraph that begins with “10.”, it is stated that “we will not be accepting solid waste”. See comment 4.
13. The paragraph that begins with “15.” addresses training. Please note that training of operators of solid waste management facilities is required by NCGS 130A-309.25. The facility will need to keep records of the training.

14. The paragraph that begins with “17.” addresses documents and records that will be part of the facility’s operating record. Please note that the facility also needs to keep records of the amount and source (county) of the waste received and records of the amount and location of waste and materials shipped offsite for the transfer station. These records will be need for annual reporting.

15. Please provide a site and building layout which shows the location of key areas of operation for the facility.

16. Financial assurance is required for solid waste management facility permit holders to ensure that sufficient funds for closure will be available during the active life of the facility and at closure. (See NCGS 130A-295.2) An estimate of the closure cost should be provided based on the following assumptions:

- the cleanup will be conducted by a third party,
- the cleanup quantity equal to 5-days of the daily acceptance rate plus the maximum amount of recyclable materials that could be stored onsite,
- no recycling value of materials, and
- all material will be removed and properly disposed at a landfill.

The amount of the financial assurance must be approved by the permitting staff prior to the establishment of the financial instrument.

Please respond to each item and make changes to the application as appropriate. The response will be reviewed and an additional review letter issued if needed.

If you have any questions regarding this matter, please contact me at (919) 707-8257 or by email at [pat.backus@ncdenr.gov](mailto:pat.backus@ncdenr.gov).

Sincerely,

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

cc: Ed Mussler, P.E., Permitting Branch Head  
Dennis Shackelford, Eastern District Supervisor  
Wes Hare, Environmental Senior Specialist  
Sarah Rice, Compliance Officer