REPUBLIC SERVICES

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SOLID WASTE SECTION
ASHEVILLE REGIONAL OFFICE

February 9th, 2016

Department of Environment and Natural Resources
Division of Waste Management
Solid Waste Section
2090 US Highway 70
Swannanoa, North Carolina 28778

Attention: Mr. Bill Wagner
Environmental Specialist

Re: ***Facility Compliance Audit Report, Yancey-Mitchell Transfer Station, dated January 12, 2016***

Dear Mr. Wagner,

Republic Services of North Carolina, LLC (Republic) is submitting our response to your Notice of Violations, A and B from your January 12, 2016 site audit at the Yancey-Mitchell Transfer Station. In addition, this letter will provide information on actions that are currently being taken to satisfy your conditions 1 through 4.

Violation A

In response to the violation of 15A NCAC 13B .0203(d), pertaining to failure to maintain sanitary conditions as required by Permit Condition 48(a):

> Republic will clean the tipping floor and trailer loading area at the end of each day. The daily cleaning will include the complete removal of all waste from the floors, walls, ledges and drains for proper disposal. On a quarterly basis or more frequently if needed, floors and walls will be pressure washed and documented. This work will be completed by March 1, 2016.

Violation B

In response to the violation of 15A NCAC 13B .0203(d), pertaining to failure to capture and properly treat all water that comes in contact with solid waste (i.e. leachate) before its release to the environment:

> Republic has updated the procedures with the County regarding contacting the wastewater pump and haul contractor along with completing forms for documentation that this process is being followed.

Condition 1

By February 12, 2016, develop and submit a written plan with timeline, for review and approval by the Section, to Bill Wagner, for correcting the violations cited in this Notice of Violation letter.

Please consider this letter as our written plan with time line for your review and approval.

Condition 2

To correct violations and come in compliance with 15A NCAC 13B .0201(h) and 15A NCAC 13B .04.02(1) the permit holders must clean the interior walls on the tipping floor of the transfer station; clean the walls of the receiving bay; and clean all horizontal support members; and clean all trench drains in the transfer station.

Republic is subcontracting this work with a 3rd party vendor with pressure washing capability. Work will be scheduled to be completed by March 1, 2016 and will be conducted on a quarterly basis going forward.

Condition 3

To correct the violation, and come in compliance with 15A NCAC 13B .0402(3) the permit holders must implement the corrective action plan required in item #1 above.

Republic will implement the corrective actions mentioned in this letter.

Condition 4

Within 10-days of receipt of this Notice of Violation, contact Jaclynne Drummond, Compliance Hydrogeologist, to determine the requirements for a soil sampling plan to investigate the extent of the leachate release.

Republic contacted Jaclynne Drummond within 10-days of receipt of this Notice. Ms. Drummond has forwarded a copy of the investigative requirements. Republic has contracted with Joyce Engineering to conduct this investigation and ASI Labs to conduct the analytical on the collected soil samples.

Conclusion

Republic understands the importance of eliminating the release of leachate into the environment and will continue to work towards solutions to prevent these events from occurring.

As for the cleaning requirements and operational changes needed at this facility, everything is being implemented as quickly as possible with planned completion by the end of this month. A refresher operator's training will be conducted by March 1, 2016 at the site. If you have any questions or comments, please contact me at 216-965-9992

Sincerely,
REPUBLIC SERVICES OF NC, LLC

Mr. Anthony L. Gregory, P.E.
Area Environmental Manager

Cc: Drew Isenhour, Republic Services
Ray Hoffman, Republic Services
Don Phelps, Republic Services
Jeff McCree, Republic Services